

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America
v.
YOUSEF OMAR BARASNEH

Case No.

20m 861

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 9/15/2019-9/23/2019 in the county of Racine in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 241

Conspiracy against rights

This criminal complaint is based on these facts:

See Attachment

☒ Continued on the attached sheet.


Complainant's signature

Special Agent Jessica Krueger, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

January 16, 2020


Judge's signature

City and state:

Milwaukee, Wisconsin

William E. Callahan

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, Jessica Krueger, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the FBI and have been since November 2009. I am involved in investigations of persons suspected of violations of Federal law in the State of Wisconsin and throughout the United States. I have gained experience conducting investigations through formal training and consultation with local, state, and federal law enforcement agencies as well as from law enforcement investigations themselves. I have assisted in multiple criminal investigations and participated in numerous search and arrest warrants related to such investigations

2. I make this affidavit in support of a criminal complaint and arrest warrant for YOUSEF OMAR BARASNEH, who committed violations of Title 18, United States Code, Section § 241 (conspiracy against rights) in the State and Eastern District of Wisconsin and elsewhere, namely, from on or around September 15, 2019, through on or around September 23, 2019, BARASNEH and other known and unknown individuals conspired to injure, oppress, threaten, and intimidate minority citizens, including Jewish citizens, of the United States, in the free exercise and enjoyment of the right secured by the Constitution and laws of the United States, to hold and use real and personal property in the same manner as

that right is enjoyed by white citizens, as guaranteed by Title 42, United States Code, Section 1982.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

4. The FBI has been investigating criminal activity by members of an organization called "The Base," a neo-Nazi group that aims to unify militant white supremacists around the globe and provide them with paramilitary training in preparation for a "race war." As described herein, Yousef Omar BARASNEH is a member of the "The Base," and in September 2019, he conspired with others to vandalize property associated with Jewish citizens, and participated in vandalizing a synagogue in Racine, Wisconsin.

5. On September 22, 2019, law enforcement officers in Wisconsin discovered that the Beth Israeli Sinai Congregation located at 3009 Washington Avenue Racine, Wisconsin, had been vandalized. Specifically, the officers saw swastikas, the symbol for The Base, and anti-Semitic words spray-painted on the exterior of the building. The synagogue is an active organization comprised of Jewish members who worship and conduct other religious activities therein.

6. Similarly, on September 21, 2019, law enforcement officers in Hancock, Michigan, discovered that the Temple Jacob had been vandalized. Specifically, they

saw swastikas and the symbol of The Base spray-painted on the exterior of the building. As with the synagogue in Racine, Wisconsin, the synagogue in Michigan is an active organization comprised of Jewish members who worship and conduct other religious activities therein.

7. Based on my training and experience and familiarity with this investigation, I am aware that The Base is a white, racially-motivated extremist group that describes itself as an “international survivalism & self-defense network, for nationalists of European descent,” and offers “IRL” (in real life) survivalist training to resist “our People’s extinction,” or the extinction of the white race. Members of The Base communicate with each other through online platforms and encrypted online messaging applications and chat rooms. In these communications, they have discussed, among other things, acts of violence against minorities (including African Americans and Jewish-Americans), Base military training camps, and ways to make improvised explosive devices (“IEDs”). The symbol used by The Base is a black flag with three white Runic Eihwaz symbols.

8. Based on information I have received during the course of this investigation, I am aware that The Base has been active in Wisconsin and that there are members of the “North Central region,” alternatively known as the “Great Lakes cell,” based in Wisconsin. For instance, in early June 2019, Base recruitment flyers were posted at Marquette University in Milwaukee, WI. In July 2019, The Base organized an armed training session for members in Wood County, Wisconsin, and posted photos to social media about the session. And, as noted above, the

symbol for The Base was discovered spray-painted on the Beth Israel Sinai Congregation synagogue in Racine, WI.

9. As part of the investigation, the FBI received information from an individual associated with The Base, who I will refer to as co-conspirator #1 ("CC1"). In statements to the FBI between October 2019 and December 2019, CC1 admitted that in September 2019, he directed other members of The Base to vandalize minority-owned properties throughout the country. CC1 called this "Operation Kristallnacht"¹ and directed others to "tag the shit" out of synagogues. Based on my training and experience and familiarity with this investigation, I believe that CC1 meant that synagogues should be spray-painted with anti-Semitic graffiti. CC1 further elaborated on his instructions to other Base members, stating that "if there's a window that wants to be broken, don't be shy." CC1 told the FBI that the operation was nationwide, and that CC1 knew members of The Base's Great Lakes cell carried out attacks against synagogues in Wisconsin and Michigan.

10. CC1 stated that the person who carried out the attack on the synagogue in Racine, Wisconsin, was a Base member known as "Joseph" or "Josef." CC1 stated that Joseph was a member of The Base's Great Lakes cell and was from Wisconsin. CC1 stated that Joseph joined The Base around March 2019, and had

¹ Based on publicly available information, I am aware that Operation Kristallnacht, or the Night of Broken Glass, is an event that occurred in Nazi Germany on November 9 and 10, 1938. During this time, Jewish homes, hospitals, and schools throughout Germany were ransacked and demolished by Nazi paramilitary soldiers and civilians. The name "Kristallnacht" comes from the shards of broken glass that littered the streets after the windows of Jewish-owned stores, buildings, and synagogues were smashed.

been vetted by the group's leader. According to CC1, after the Racine synagogue attack, Joseph sent CC1 a message on an encrypted platform with a news article about the attack and wrote something to the effect of "here's what I did."

11. CC1 stated that CC1 had never met Joseph in person. But, they had communicated with each other via an encrypted message application, which can be accessed via computer, cell phone, or other electronic device such as a tablet. CC1 knew Joseph to be a large individual. CC1 and Joseph had planned to meet in person at a Base meeting in Georgia in late October/early November 2019, but CC1 ultimately did not attend that meeting.

12. Information provided by CC1 has been corroborated by investigators. For instance, in November 2019, the FBI obtained a search warrant for CC1's residence and electronic devices. In CC1's electronic devices, investigators found evidence showing that that around September 17, 2019, and again on September 21, 2019, CC1 conducted multiple Google searches for "Kristallnacht." Following the search for "Kristallnacht" on September 17, 2019, CC1 used an internet browser to access an encrypted messaging application known to be utilized by members of The Base. The digital evidence showed that CC1 accessed the encrypted messaging application and visited a section of the application that was labeled with the symbol for The Base.

13. On September 23, 2019, CC1 conducted multiple Google searches for "racine, wi," "racine wi nazi," and "racine wi anti-semitic." CC1 also accessed news

websites and Twitter that had posted articles and comments on the Racine synagogue vandalism. Further, the device evidence shows that on September 23, 2019, CC1 accessed the same encrypted messaging application noted above. The evidence showed that CC1 accessed a section of the encrypted messaging application that was labeled with "JOSEPH." Based on my training and experience and my involvement in this investigation, I believe that CC1 was using the encrypted messaging application to exchange messages with members of The Base, including "JOSEPH."

14. As part of the FBI's investigation into the Base, an FBI undercover employee (UCE) gained access The Base's members-only chat room on the encrypted messaging application discussed above. This included a group chat in September 2019 among several individuals in which CC1, utilizing his known Base online moniker, urged other members of the group chat to respond to the doxing² of a Base member. CC1 directed that between September 20-25, 2019, CC1 wanted them to "get out and act. Flyers, windows, and tires." He also told members of the group chat that arsons, breaking windows, and slashing tires are near impossible to track. In response to CC1's call to action, a chat member named "Joseph" responded "I agree with that . . . calculated action" and tagged CC1's online moniker. Joseph

² Based on publicly available information, I am aware that "doxing" is the online practice of researching and broadcasting private or identifying information about an individual or organization. The methods employed to acquire this information include searching publicly available databases and social media websites, hacking, and social engineering. Doxing is often done with malicious intent.

went on to write “imagine if across the country on local news, Everyone is reporting on new nazi presence.” CC1 in the same chat wrote “20th—25th, vandalize my friends. We’ll push back on the enemy as they push bacjk [sic].” Another member of the chat wrote “No point in random vandalizing... Much more effective if its targeted,” to which Joseph responded “^^ MAKE IT WORTH IT.” As part of the chat, CC1 wrote “Kristallnacht” and Joseph wrote “Take your time, plan your out your AO.” Later on in the group chat, Joseph wrote “Our op will be a perfect fuck you to these kikes if we become terrorists.” CC1 later wrote a long entry titled “Operation Kristallnacht,” discussing why this was the time to act, to which Joseph responded “Sieg Heil.”

15. CC1 has been arrested and charged in another federal district court with violating 18 U.S.C. § 241. The charges relate to CC1’s conduct in directing other Base members to attack synagogues in Racine, Wisconsin, and Hancock, Michigan, as described above.

16. As noted above, during CC1’s interviews with the agents, he stated that he had planned to meet Joseph in person at a Base meeting in Georgia in late October/early November 2019, but CC1 ultimately did not attend that meeting. As discussed below, that Base meeting did occur in Silver Creek, Georgia, from about October 30, 2019 until November 2, 2019, and that the Base member known as Joseph attended the meeting.

17. Between October 31 and November 3, 2019, the UCE participated in an “in real life” or “IRL” meeting of The Base at the residence of a Base member in Silver Creek, Georgia. About a dozen individuals participated in the event, including the Base member known as Joseph. The meeting included firearms training, grappling, basic medical training, and a pagan “blot” ritual where a goat was sacrificed. UCE observed Joseph participate in many of these activities.

18. The Base member known as Joseph was observed by the FBI arriving and departing this meeting while driving a dark GMC SUV bearing Wisconsin license plate 671NGF. Records show that the vehicle is registered to BARASNEH’s known residence in Oak Creek, Wisconsin.

19. I have reviewed images of “Joseph” from the Base meeting in Georgia, and BARASNEH’s Wisconsin Driver’s License photo, and I believe that The Base member known as Joseph is BARASNEH. Further, on November 15, 2019, November 25, 2019, December 5, 2019, and January 10, 2020, FBI agents observed BARASNEH driving the GMC SUV bearing Wisconsin license plate 671NGF in and around Oak Creek, Wisconsin.

20. As part of the investigation, I reviewed information from Wyndham Hotels and Resorts showing that on October 30 to 31, 2019, BARASNEH registered to stay at a La Quinta Inn located in Rome, Georgia, and provided his known home address in Oak Creek. That hotel is approximately seven miles from the Base

residence in Silver Creek, Georgia, where the Base meeting took place that same weekend.

21. As part of the investigation, FBI agents identified several dates and locations where members of the Base were believed to have been. This included (1) July 27, 2019, the date that The Base conducted training at the Wood County Firing Range, Town of Seneca, Wood County, WI; and (2) the evening of September 21, 2019, when the Beth Israeli Sinai Congregation located in Racine, Wisconsin, was vandalized. Thereafter, pursuant to a court order, agents obtained information about cell phone connections to towers near those locations on those dates. The cell tower information revealed that, on July 27, 2019, between 7:00 a.m. and 7:00 p.m., a device with telephone number 414-XXX-8150 pinged approximately 78 times off the tower close to the Wood County Firing Range, Town of Seneca, Wood County, WI. The information further showed that on September 21, 2019, between 8:38 p.m. and 9:08 p.m., the device with that number pinged approximately 6 times off the tower close to 3009 Washington Avenue, Racine, Wisconsin.

22. Records obtained from AT&T show that during the relevant time period, the phone number 414-XXX-8150 was issued to subscriber O.B. and user Yousef BARASNEH, with a billing address of BARASNEH's known residence in Oak Creek, Wisconsin. Police records further show that on October 24, 2017, BARASNEH had contact with the Oak Creek Police Department and reported to the officers that 414-XXX-8150 was his phone number. Records from AT&T further show that, between October 30 and November 2, 2019, the device with phone

number 414-XXX-8150 connected with cell towers near Rome, Georgia, and Silver Creek, Georgia.

CONCLUSION

23. Based on the above information, I submit there is probable cause to believe that YOUSEF OMAR BARASNEH committed violations of 18 U.S.C. § 241.